

United States Courts
Southern District of Texas
FILED

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

MAY 04 2017

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

v.

DARLA KAY BEEDE
Defendant.

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§

CRIMINAL NO.

CRIMINAL INDICTMENT

17 CR 0256

THE GRAND JURY CHARGES:

INTRODUCTION

At all times material to this Indictment:

1. Chevron Phillips Chemical Company LP was an indirect wholly-owned subsidiary of Chevron Phillips Chemical Company, LLC (hereafter "Chevron"), one of the world's top producers of olefins and polyolefins and a leading supplier of aromatics, alpha olefins, styrenics, specialty chemicals, plastic piping and polymer resins.

2. Chevron is headquartered in The Woodlands, Texas and employs approximately 5,000 employees.

3. JPMorgan Chase Bank, N.A. (hereafter "Chase"), doing business as Chase Bank, was headquartered in New York City with its credit card processing center in Newark, Delaware.

4. **DARLA KAY BEEDE (hereafter "BEEDE")** was an administrative assistant at a Chevron facility in Pasadena, Texas.

5. Chevron issued company credit cards via Chase MasterCard and Visa to their employees to use for work related items.

6. **BEEDE** was issued several company credit cards from Chevron, which she

controlled on behalf of various managers.

7. Throughout the indictment when the term “credit card” is used it is referencing the Chevron company issued Chase MasterCard and Visa credit cards.

COUNT ONE
WIRE FRAUD
(18 U.S.C. §§1343 & 2)

THE SCHEME

8. From on or about March 2009 continuing to March 2016, in the Southern District of Texas and elsewhere,

DARLA KAY BEEDE

Defendant herein, aided and abetted with others known to the Grand Jury, did intentionally and knowingly devise and intend to devise a scheme and artifice to defraud, and for obtaining money by means of false and fraudulent pretenses, and in the execution of said scheme and artifice, did knowingly transmit and cause to be transmitted by means of wire communications in interstate or foreign commerce, writings, signs, signals, pictures, or sounds, an example as set forth in the counts below.

PURPOSE OF THE SCHEME

9. It was the purpose of the scheme that Defendant would and did unlawfully and fraudulently use Chevron issued Chase credit cards in order to enrich herself in the amount of at least \$2,000,000.00 USD.

MANNER AND MEANS OF THE SCHEME TO DEFRAUD

It was a part of the scheme that:

10. She would and did use company credit cards to purchase pre-paid debit and gift

cards for her own personal use.

11. She would and did use company credit cards to purchase copper wire.

12. She would and did sell the fraudulently obtained copper wire for her own personal profit.

13. She would and did use her home computer to falsify receipts from vendors by changing the item descriptions to reflect something else other than copper wire.

14. She would and did forge expense accounts statements and authorization signatures to conceal her unlawful spending.

15. She would and did provide fictitious receipts from various vendors to accounts payable at Chevron for spending justification.

EXECUTION OF THE SCHEME AND ARTIFICE

16. On or about the dates set forth below, for the purpose of executing the aforementioned scheme to defraud and intending to do so, the defendant did transmit and cause to be transmitted in interstate and foreign commerce certain writings, signals and sounds, that is, the defendant used Chevron's credit cards to make purchases in the following amounts which caused an electronic signal to travel across state lines from a computer located in the Southern District of Texas to a Chase computer in Newark, Delaware:

COUNT	DATE	PURCHASE AMOUNT	TRANSACTIONS
1	9/2/14	\$3,339.80	Debit and gift cards from Office Depot located Houston, Texas.
2	11/18/15	\$3,329.18	Copper wire from Bay Electric located in Houston, Texas.
3	11/6/15	\$1,443.00	Copper wire from Home Depot located in Houston, Texas.

All in violation of 18 U.S.C. §§ 1343 and 2.

NOTICE OF CRIMINAL FORFEITURE
28 U.S.C. § 2461(c); 18 U.S.C. § 981(a)(1)(C)

Pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 981(a)(1)(C), the United States gives notice to the defendant,

DARLA KAY BEEDE

that in the event of conviction of the wire fraud counts charged in this Indictment, the United States intends to seek forfeiture of all property, real or personal, which constitutes or is derived from proceeds traceable to such offenses.

Money Judgment

Defendant is notified that upon conviction, a money judgment may be imposed equal to the total value of the property subject to forfeiture.

Substitute Assets

Defendant is notified that in the event that property subject to forfeiture, as a result of any act or omission of defendant,

- (A) cannot be located upon the exercise of due diligence;
- (B) has been transferred or sold to, or deposited with, a third party;
- (C) has been placed beyond the jurisdiction of the court;
- (D) has been substantially diminished in value; or
- (E) has been commingled with other property that cannot be divided without difficulty,

it is the intent of the United States to seek forfeiture of any other property of the defendant up to the total value of such property pursuant to Title 21, United States Code, Section 853(p), incorporated by reference in Title 28, United States Code, Section 2461(c).


TRUE BILL:

ORIGINAL SIGNATURE ON FILE


FOREPERSON OF THE GRAND JURY

ABE MARTINEZ
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By:


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